

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

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MELISSA SOLANO and CEIL STEARMAN)	
)	08 CV 3909
Plaintiffs,)	
)	Judge Joan Humphrey Lefkow
- against -)	
)	Magistrate Judge Valdez
ROLLING STONE L.L.C.,)	
)	
Defendant.)	
)	
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**UNOPPOSED MOTION FOR EXTENSION OF TIME
FOR DEFENDANT TO ANSWER OR OTHERWISE PLEAD**

Defendant, Rolling Stone L.L.C. (“Defendant”), moves this Court for an extension of time within which to answer or otherwise plead to plaintiffs, Melissa Solano and Ceil Stearman’s (“Plaintiffs”) complaint in the above-captioned action, to and including August 11, 2008. In support of its motion, Defendant states as follows:

1. On or about May 23, 2008, Plaintiffs filed a complaint against Defendant in the Circuit Court of Cook County entitled *Melissa Solano and Ceil Stearman v. Rolling Stone L.L.C.* Case No. 08 L 5729 (“Complaint”).
2. On or about June 10, 2008, Defendant was served with copies of the Summons and Complaint.
3. On or about July 3, 2008, Defendant contacted Plaintiffs’ counsel with a request to extend the time for Defendant to answer or otherwise plead to Plaintiffs’ complaint.
4. On July 3, 2008, Plaintiffs’ counsel signed a stipulation to extend the time for Defendant to answer or otherwise plead up to and including August 11, 2008. A copy of the stipulation is attached to this Motion as Exhibit A.

5. On July 9, 2008, Defendant filed a Notice of Removal with this Court to remove this matter from state court on diversity jurisdiction grounds.

6. On July 10, 2008, counsel for Plaintiffs affirmed via e-mail that Plaintiffs do not oppose a thirty day-extension of time for Defendant to answer or otherwise plead.

WHEREFORE, Defendant, Rolling Stone, L.L.C., respectfully requests an additional thirty (30) days, to and including August 11, 2008, in which to answer or otherwise respond to Plaintiffs' Complaint.

Dated: July 10, 2008

Respectfully submitted,

ROLLING STONE, L.L.C.

By: /Steven L. Baron/

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Attorneys for Defendant

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**IN THE CIRCUIT COURT OF COOK COUNTY
COUNTY DEPARTMENT, LAW DIVISION**

MELISSA SOLANO and
CEIL STEARMAN,

Plaintiffs,

vs.

ROLLING STONE L.L.C.,
a Foreign Corporation,

Defendant.

No. 08 L 5729
Calendar S

STIPULATION

The parties, by their respective counsel, hereby stipulate to extend the time for defendant, Rolling Stone, L.L.C., to answer or otherwise plead to plaintiff's complaint, to and including August 11, 2008.

AGREED TO BY:

MELISSA SOLANO and CEIL
STEARMAN

By: 

Steven A. Sigmond
Attorney for plaintiffs

Dated: July 3rd, 2008

ROLLING STONE L.L.C.

By: 

Elizabeth McNamara
Attorney for defendant

Dated: July 7, 2008

Prepared by:

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